

UNITED STATES BANKRUPTCY COURT
GEORGE C. YOUNG FEDERAL COURTHOUSE
400 WEST WASHINGTON STREET, SUITE 5100
ORLANDO, FL 32801

In re:

CATHERINE ECKLEY BENTLEY,
Debtor.

Case No. 6:17-bk-00294-KSJ
Chapter 7

SUSAN KOLB, M.D.,
Plaintiff,

Adv. No. 6:17-ap-00047-KSJ

v.

CATHERINE ECKLEY BENTLEY,
Defendant.

ROBERT E. THOMAS,
Plaintiff,

Adv. No. 6:17-ap-00048-KSJ

v.

CATHERINE ECKLEY BENTLEY,
Defendant.

SUSAN KOLB, M.D.,
Plaintiff,

Adv. No. 6:17-ap-00119-KSJ

v.

CATHERINE ECKLEY BENTLEY,
Defendant.

**DEBTOR'S MOTION TO EXTEND DISCOVERY DEADLINE TO TAKE DEPOSITION
OF A MEDICAL EXPERT CONCERNING DEBTOR'S MENTAL CAPACITY**

COMES NOW Debtor, CATHERINE ECKLEY BENTLEY, through her undersigned counsel, and files this Motion to Extend Discovery Deadline to Take Deposition of a Medical Expert Concerning Debtor's Mental Capacity, and as grounds in support states:

1. This matter is set for trial on April 25, 2018.

2. The current deadline for close of discovery is March 16, 2018.
3. The mediation settlement conference is scheduled for March 9, 2018.
4. Debtor is 94 years old.
5. A central issue in this case is Debtor's mental capacity since Plaintiffs allege that Debtor committed acts of actual fraud and caused willful and malicious injury to Plaintiff, Dr. Kolb.
6. Upon information, Debtor's primary care physician, Deanna Springer, M.D., diagnosed Debtor with a vascular dementia and memory loss.
7. Dr. Springer had been previously disclosed as a potential witness in Debtor's Rule 26(a)(1) disclosure.
8. Dr. Springer is not available for deposition until April 3, 2018 at 2:00 p.m.

WHEREFORE, Debtor moves this Court for an entry of an order extending discovery deadline to take deposition of Dr. Springer on April 3, 2018 at 2:00 p.m., or such other date set by the Court, and for such further relief the Court deems equitable and just under the circumstances.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic transmission, if registered in the Electronic Case Filing System, otherwise by U.S. Mail: U.S. Trustee, Chapter 7 Trustee, Synchrony Bank, Walmart, County of Volusia, Synovus Bank, counsel for Trustee and creditor Susan Kolb, Esther McKean, this 2d day of March, 2018.

/s/ Anna Handy

Anna Handy, Attorney for Debtor
Florida Bar No.: 0119532
Anna Handy Law Firm, P.A.
P.O. Box 730083
Ormond Beach, FL 32173
Telephone: 386-248-3000

Facsimile: 386-401-2511
anna.handy2015@gmail.com